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EMAIL REGARDING U S EPA REGION V COMMENTS ON THE SITE  
CHARACTERIZATION/DELINEATION SAMPLING EFFORT AT SOLID WASTE  
MANAGEMENT UNIT 21 NSA CRANE IN  
3/3/2014  
U S EPA REGION V

## Lyons, Karen

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**From:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>  
**Sent:** Monday, March 03, 2014 11:59 AM  
**To:** GRIFFIN, DOUG; Brent, Thomas CIV NAVFAC MW, PWD Crane EV  
**Cc:** Hickey, Howard M CIV NAVFAC MW EV; Basinski, Ralph; Lyons, Karen; Barringer, Rick  
**Subject:** RE: SWMU 21 Sampling Plan (RESPONSE TO IDEM COMMENTS)

Hi all,

Some feedback with respect to TSCA.

As this is a site characterization/delineation sampling effort versus a cleanup proposal, there is no specific approval required under TSCA. The regs require pre-approval for cleanup actions taken under the self-implementing or risk based disposal provisions under 40 CFR 761.61. Once you have a handle on the extent of PCB contamination, the Navy can propose a cleanup plan to IDEM as I'm going to assume at this point that the Navy's preference would be to address the multi-contaminant site issues under the RCRA CA program. If so, we could take the Coordinated Approval route that Doug & I took for a different site where EPA TSCA would issue a Coordinated Approval of the IDEM RCRA CA Remedial Action Approval. Of course, the Navy can avail itself of the self-implementing (for soils - does not apply to sediments) or risk-based cleanup options under 761.61, but if we'd look to do the cleanup under RCRA, then EPA would still essentially view it as a risk-based approach using the Coordinated Approval authority under 761.77. The Navy would have to request a Coordinated Approval under that provision at the time it submits the cleanup proposal to IDEM.

If it were strictly a self-implementing cleanup, the 25 mg/kg cleanup standard would apply to low-occupancy situations as defined in 761.3. For TSCA, the Navy would have to justify that the 25 mg/kg cleanup level for DRMO would not present unreasonable risk to human health or the environment. A HH/eco risk evaluation/assessment done under RCRA for the appropriate exposure scenarios/site use would be a way to do so.

Hope that helps - let me know if you have additional questions.

Thanks,  
Peter

-----Original Message-----

From: GRIFFIN, DOUG [<mailto:DGRIFFIN@idem.IN.gov>]  
Sent: Thursday, February 27, 2014 9:44 AM  
To: Brent, Thomas CIV NAVFAC MW, PWD Crane EV  
Cc: Hickey, Howard M CIV NAVFAC MW EV; 'Basinski, Ralph'; Lyons, Karen; Barringer, Rick  
Subject: RE: SWMU 21 Sampling Plan (RESPONSE TO IDEM COMMENTS)

One more thing...the states are not authorized for TSCA, so I can't approve the PCB plans. You need to do that thru Peter. I know it's referred to as 'Self-Implementing', but we've seen situations in the past where facilities ran afield of TSCA because their workplans weren't pre-approved.

There is a provision in the Self-Implementing that you notify EPA TSCA at least 30 days before implementing your plan (I assume that means the removal activities, but I don't know).

And, there was one site that was doing Self-Implementing where Peter had me review and approve the plans, and then he did a 'Coordinated Approval'.

I highly recommend you get this straight with Peter before you do any removal activities.

-----Original Message-----

From: Brent, Thomas CIV NAVFAC MW, PWD Crane EV [<mailto:thomas.brent@navy.mil>]  
Sent: Thursday, February 27, 2014 9:43 AM  
To: GRIFFIN, DOUG  
Cc: Hickey, Howard M CIV NAVFAC MW EV; 'Basinski, Ralph'; Lyons, Karen; Barringer, Rick  
Subject: FW: SWMU 21 Sampling Plan (RESPONSE TO IDEM COMMENTS)

Doug,

Thanks for the questions/comments. For ease of reading (and since the Navy email system is text only), I'm providing our responses in the attached Word document.

-Tom

-----Original Message-----

From: GRIFFIN, DOUG [<mailto:DGRIFFIN@idem.IN.gov>]  
Sent: Wednesday, February 26, 2014 3:14 PM  
To: Brent, Thomas CIV NAVFAC MW, PWD Crane EV  
Cc: Hickey, Howard M CIV NAVFAC MW EV; Basinski, Ralph; Lyons, Karen  
Subject: RE: SWMU 21 Sampling Plan

Tom,

I have no concerns or comments relative to the sample locations for the constituents. Just two peripheral comments:

I am NOT a TSCA expert, but I thought the 25ppm concentration was for industrial 'low occupancy' areas...that may not be correct but you should probably verify it.

The plan is to have a professional surveyor log the sampling points. Hand held GPS units exist that are pretty accurate for X and Y coordinates (we have found survey grade equipment is needed for elevation).

-----Original Message-----

From: Brent, Thomas CIV NAVFAC MW, PWD Crane EV [<mailto:thomas.brent@navy.mil>]  
Sent: Friday, February 14, 2014 7:23 AM  
To: GRIFFIN, DOUG  
Cc: Hickey, Howard M CIV NAVFAC MW EV; Basinski, Ralph; Lyons, Karen  
Subject: FW: SWMU 21 Sampling Plan

Doug,

Attached is the Sampling and Analysis Plan for a third round of additional delineation sampling at SWMU 21, the DRMO Scrap Yard. Since this is a continuation of a field effort begun under the August 2010 SWMU 21 SAP and the March 2011 SWMU 21 SAP Addendum, I'm submitting this via email only. If you think a hard copy with an official Navy letter is required, let me know and I'll get one out. Please review and let us know if you have any comments or questions.

Thanks,  
Tom

